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### INTERROGATORIES

13. If the Commission requires Verizon to offer a non-recurring charge (NRC) to recover its infrastructure cost on a per ampere basis, how much should such a charge be?

**Response:**

If the Commission were to require Verizon FL to recover its power infrastructure costs (which do not include AC utility costs or maintenance costs) through an NRC, the appropriate rate would be \$ [REDACTED] per amp. Note that this NRC would not include infrastructure replacement costs, as explained at pages 7-8 in Verizon FL's Response to Motions for Reconsideration, filed in this docket on December 18, 2003.

14. If maintenance costs are included in the NRC provided in Interrogatory No. 13 above, what portion of the charge is attributable to maintenance?

**Response:**

Verizon FL's response to Covad Interrogatory No. 13 does not include maintenance costs.

15. If maintenance costs are not included in the NRC provided in Interrogatory No. 13 above, what additional charges would apply if the Commission required the NRC to reflect maintenance?

**Response:**

Verizon FL cannot provide the information requested in the format requested. Maintenance costs should be recovered as they are incurred — on a monthly recurring basis. The appropriate power infrastructure maintenance monthly recurring charge would be \$ [REDACTED] per amp. In addition, Verizon FL would be entitled to recover the costs incurred in emergency generator testing via a monthly recurring charge.

16. Provide all calculations supporting the charges listed in Interrogatory Nos. 13-15 above.

**Response:**

See Verizon FL's Response to Covad POD Request No. 2.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

State of Florida

Covad's Second Request for Production of Documents to Verizon Florida Inc.

Docket Nos. 981834-TP/990321-TP

Attachment Covad POD 2(a)

DC Power

Ln	Cost Elements (a)	Increment (b)	Source (c)	Cost (d)
	DC Power			
1	DC Power Infrastructure	per amp	DC Power Fac 1-CS	

Note:

Revised power study.

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State of Florida

Covad's Second Request for Production of Documents to Verizon Florida Inc.

Docket Nos. 981834-TP/990321-TP

Attachment Covad POD 2(a)

DC Power Facility

Ln	Description (a)	Source (b)	Power Supply Cost (per 1 amps) (c)
1	Equipment Investment	DC Power Fac 2-CS	
2	Engineering & Installation	DC Power Fac 2-CS	
3	Total Investment	Ln 1 + Ln 2	

Note:

Revised power study.

Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.

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State of Florida

Covad's Second Request for Production of Documents to Verizon Florida Inc.

Docket Nos. 981834-TP/990321-TP

Attachment Covad POD 2(a)

DC Power Facility -- Equipment and Labor Costs

**REDACTED**

Description				Power Equipment		Power Labor	
Ln	CO Line Sizes	Amps (Note 2)	Line %	Power Equipment Cost	Cost per Amp	Power Labor Cost	Cost per Amp
		(a)	(b)	(c)	(d)=(c)/(a)*(b)	(e)	(f)=(e)/(a)*(b)
1							
2							
3							
4							
				Total per Amp	\$ -	\$ -	

Note:

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Power Equipment											Power Installation						
Ln	Power Plant	Line Size	Rectifiers/ Controller	Batteries	Buss Bar	Main Distribution Bay & Alarm	Monitoring Bay	Secondary Distribution Bay	Grounding	Subtotal	Generator	Total Equipment	Power Installation	Generator Installation	Misc	Supply & Sales Tax	Total Installation
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j=c ..i)	(k)	(l=j+k)	(m)	(n)	(o)		(q=m..p)
1	450 Amp Power Plant																
	Up to:																
2	650 Amp Power Plant																
	Up to:																
3	1300 Amp Power Plant																
	Up to:																
4	1950 Amp Power Plant																
	Up to:																

Power Equipment Labor and Labor Rates

Generator Equipment Labor and Labor Rates

Group	Function	Labor Rate
Planung (011)	Planung	
Network Engineering (011)	Hardware Eng	
COEI (101)	Installation	
Maintenance (211)	Service Work	
Totals		

Supply, Freight & Sales Tax

Note:  
 Revised power study

Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.

**REDACTED**

State of Florida

Covad's Second Request for Production of Documents to Verizon Florida Inc.

Docket Nos. 981834-TP/990321-TP

Attachment Covad POD 2(b)

DC Power Maintenance Costs

Ln	Cost Elements (a)	Increment (b)	Source (c)	Cost (d)
	<b>DC Power</b>			
1	DC Power Maintenance Costs	per amp	DC Power Maint 1-CS	
2	Contribution Amount		Ln 1 * Fixed Allocator	
3	Total Monthly Recurring Cost			\$ -

**REDACTED**

Note:

Revised power study.

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State of Florida

Covad's Second Request for Production of Documents to Verizon Florida Inc.

Docket Nos. 981834-TP/990321-TP

Attachment Covad POD 2(b)

DC Power Facility - Maintenance Costs

Description				Power Maintenance	
Ln	CO Line Sizes	Amps (Note 2)	Line %	Power Maintenance Cost	Cost per Amp
		(a)	(b)	(e)	(f)=(e)/(a)*(b)

- 1
- 2
- 3
- 4

**REDACTED**

Note:

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Ln	Power Plant (a)	Line Size (b)	Power Maintenance Costs (c)
1	450 Amp Power Plant		
	Up to		
2	650 Amp Power Plant		
	Up to:		
3	1300 Amp Power Plant		
	Up to:		
4	1950 Amp Power Plant		
	Up to:		

Power Equipment Labor and Labor Rates

Group	Function	Labor Rate
Planning (011)	Planning	
Network Engineering (011)	Hardware Eng	
COEI (101)	Installation	
Maintenance (211)	Service Work	
Totals		

Supply, Freight & Sales Tax

\* Revised power study

Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.

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